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Mr. William F. Caton  
Secretary  
Federal Communications Commission  
1919 M Street, N.W., Room 222  
Washington, D.C. 20554

Re: ET Docket No. 93-198

Dear Mr. Caton:

On behalf of Digital Microwave Corporation, we are filing an original and eleven (11) copies of its Reply Comments in response to the above cited matter.

If there are any questions, please communicate with the undersigned.

Respectfully submitted

FLETCHER, HEALD & HILDRETH

*Leonard Robert Raish*

Leonard Robert Raish  
Counsel for Digital Microwave  
Corporation

LRR:cej  
Enclosures

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BEFORE THE

**Federal Communications Commission**

WASHINGTON, D.C. 20554

JUL 29 1993

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

In the Matter of )

Preparation for International )  
Telecommunications Union )  
World Radio Conferences )

ET Docket No. 93-198

flexibility for operations on a world-wide basis. DMC encourages the development of new telecommunications technologies and believes the Commission should take steps necessary to keep the United States in the forefront in the production of operational equipment based on those new technologies.

DMC is unquestionably the leading U.S. exporter of microwave equipments. A very substantial percentage of its production is sold in export markets. For this reason, DMC is interested in spectrum allocations and telecommunications technical standards that are being considered for adoption by the International Telecommunications Union (ITU). The "18 GHz" and "23 GHz" bands are both allocated to the FIXED service on a worldwide basis and their use for this purpose is expanding very rapidly in many countries as well as the USA. Inroads have been in the "18 GHz" band to accommodate FIXED-SATELLITE services in both space-to-earth and earth-to-space directions. So far the sharing has been successful, if for no other reason the FIXED-SATELLITE services have not yet saturated the spectrum.

At WARC-92 an allocation of the 21.4-22 GHz band was made to the Broadcasting-Satellite service in ITU Regions 1 and 3 and to the Inter-Satellite service at 22.55-23 GHz on a world-wide basis. DMC feels the sharing of the latter band with terrestrial operational-fixed microwave is feasible. However, DMC has reservations about sharing the 21.4-22 GHz band between terrestrial operational-fixed microwave and the HDTV Broadcasting-Satellite service. Under Footnote 873F of the Radio Regulations the

Broadcasting-Satellite service allocation, however, does not take effect until 1 April 2007. Accordingly, DMC believes it is not essential that the 21.4-22 GHz reallocation to Broadcasting-Satellite service be taken up in either WARC-93 or WRC-95.

Finally, DMC sees substantial growth in terrestrial operational-fixed microwave in the "38 GHz" band and possibly higher bands. The current world-wide allocation of the "38 GHz" band for FIXED Service should be maintained.

**III. AGENDA FOR WRC-95 SHOULD  
BE NARROWLY FOCUSSED**

Recommendations that have accumulated in the Radio Regulations since WARC-79.

The Commission is urged to take the foregoing Reply Comments into account as it goes forward with planning for WRC-93.

Respectfully submitted,

DIGITAL MICROWAVE CORPORATION

By: Leonard Robert Raish  
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It Attorney

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